UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

Civil Action No: 4:23-cv-11800

H.B. BROOKS INTERNATIONAL, INC. d/b/a NETWATCH NORTH AMERICA	_)
Plaintiff)
V.)
ROYAL SUN FARM LLC,)
Defendant)
GFA FEDERAL CREDIT UNION)
Trustee)

STATUS REPORT

The Plaintiff submits this status report to inform the court that the Plaintiff, H.B. Brooks International, Inc. d/b/a Netwatch North America ("Netwatch"), has filed on this day the accompanying Joint Motion to Vacate Stay (the "Joint Motion"). Pursuant to a settlement agreement (the "Agreement") entered into between the Parties which is attached as Exhibit 1, the Defendant, Royal Sun Farm LLC ("Royal Sun"), was to make certain weekly payments to the Plaintiff. The Parties, under the Agreement, agreed that the case would be stayed pending payments, and that if a payment was missed, Netwatch could file the Joint Motion to Vacate Stay. The Agreement called on counsel for Netwatch to hold the Joint Motion to Vacate Stay in escrow, with permission to file in the event that any payment was not made pursuant to the Agreement. Royal Sun stopped making payments under the Agreement on January 2, 2024, thereby giving rise to Netwatch's right to file the Joint Motion to Vacate Stay. See Exhibit 2, Affidavit of Joseph Perl.

The Joint Motion to Vacate Stay also requests the filing of an Agreement for Judgment. Since that has already been filed, the Court need not re-enter the Agreement for Judgment.

Respectfully submitted,

/s/ Joseph Perl Attorney for Plaintiff B.B.O. 680509 203 Arlington St., Suite 2 Watertown, MA 02478 781-704-7047 perl@perlattorney.com January 22, 2024